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February 17, 2021

BY ECF

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Zalmund Zirkind*, S9 19 Cr. 463 (DLC)
SECOND LETTER MOTION TO AMEND BOND CONDITIONS TO ALLOW TRAVEL
TO LOCAL CEMETERY (THE OHEL) THURSDAY, FEBRUARY 25, 2021

Dear Judge Cote:

This letter is respectfully written to permit the Defendant to travel to the "The Ohel," 226-20 Francis Lewis Boulevard, Cambria Heights, NY 11411 and pray on February 25, 2021. Your Honor previously permitted the Defendant to visit the cemetery under the same conditions on November 12, 2020. The undersigned discussed this application with USPO Rothman and the assigned prosecutors who agree to this request. The Defendant previously asked for permission on February 3, 2021 but did not receive a decision before the requested date of February 11, 2021 to visit.

The Ohel, where the Lubavitcher Rebbe, Rabbi Menachem M. Schneerson, was laid to rest next to his father-in-law, the sixth Lubavitcher Rebbe, Rabbi Yosef Y. Schneerson, is described as a location where one's prayers focus on working toward new good deeds and spiritual stock-taking. It is anticipated that a round-trip prayer visit would require three to four hours, depending on traffic patterns. The Defendant, if permitted to attend, will wear a mask and comply with COVID-19 legal requirements. The Ohel management also complies with COVID-19 legal requirements.

We thank Your Honor for your review.

Very truly yours,

/s/ Neil M. Schuster
Neil M. Schuster

NMS:asnd
By ECF: Josh Rothman, PTS, Intensive Supervision Specialist
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